

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Donald Abuda, et al.,

Plaintiffs,

v.

STRONGBLOCK, et al.

Defendants.

Case No. 1:22-cv-10869

**DECLARATION OF MICHAEL J.  
ABRAMS IN SUPPORT OF MOTION TO  
DISMISS AND COMPEL ARBITRATION**

I, Michael J. Abrams, declare the following:

1. I am legal counsel for Defendants in the above-captioned case, and am admitted *pro hac vice* in the related case, *Crowl, et al. v. StrongBlock, et al.*, Case No. 1:22-cv-07313.
2. My application for *pro hac vice* admission for this case is forthcoming.
3. Attached as **Exhibit A-1** to my Declaration is a redline comparison of the Complaint filed in the related case, *Crowl, et al. v. StrongBlock, et al.*, Case No. 1:22-cv-07313, and the Complaint filed in *Abuda, et al. v. StrongBlock, et al.*, Case No. 1:22-cv-10869.
4. The redline comparison was created using the computer software program, Workshare Compare by Litera.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2023 by

/s/ Michael J. Abrams